

**Cuyahoga County Court of Common Pleas
Criminal Court Division**

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| <p style="text-align: center;">State of Ohio, Plaintiff VS. Dorothea Kingsbury, Defendant</p> | <p style="text-align: center;">A True Bill Indictment For Theft - F1 §2913.02(A)(2) 8 Additional Count(s)</p> | |
| Dates of Offense (on or about) 12/01/2012 to 04/09/2018 | The Term Of January of 2019 | Case Number 636132-19-CR |

The State of Ohio, }
Cuyahoga County } SS.

CR19636132-A

107349962



Count One **Theft - F1**
 §2913.02(A)(2)
Defendants Dorothea Kingsbury
Date of Offense On or about December 1, 2012 to November 27, 2017

The Jurors of the Grand Jury of the State of Ohio, within and for the body of the County aforesaid, on their oaths, IN THE NAME AND BY THE AUTHORITY OF THE STATE OF OHIO, do find and present, that the above named Defendant(s), on or about the date of the offense set forth above, in the County of Cuyahoga, unlawfully

did with purpose to deprive the owner, Janice Paul, of money or services, knowingly obtain or exert control over either the property or services beyond the scope of the express or implied consent of the owner or person authorized to give consent.

FURTHERMORE, and the victim of the offense is an elderly person or disabled adult and the value of the property or services stolen is \$150,000 or more.

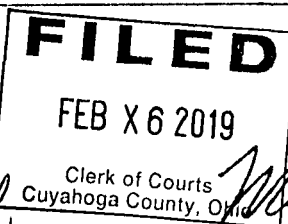
Forfeiture of Property - §2941.1417(A)

The Grand Jurors further find and specify that

the defendant(s) is/are the owner(s) and/or possessor(s) of Charles Schwab brokerage account # 558622495580714 which is contraband and/or property derived from or through the commission or facilitation of an offense, and/or is an instrumentality the offender(s) used or intended to use in the commission or facilitation of a felony offense.

(beneficiary Janice Paul: 26 questionable items from her interest checking account totaling \$159,334; 8 questionable items from her premium money market account totaling \$93,500; 16 questionable items totaling \$45,050; Total dollar amount in question \$297,884.00)

The offense is contrary to the form of the statute in such case made and provided, and against the peace and dignity of the State of Ohio.



Ann Rowland

Foreperson of the Grand Jury

Michael C. O'Malley
Clerk of Courts
Cuyahoga County, Ohio

Prosecuting Attorney

Count Two **Theft - F1**
§2913.02(A)(2)

Defendants Dorothea Kingsbury

Date of Offense On or about December 1, 2012 to November 27, 2017

The grand jurors, on their oaths, further find that the Defendant(s) unlawfully

did with purpose to deprive the owner, Robert Paul, of money or services, knowingly obtain or exert control over either the property or services beyond the scope of the express or implied consent of the owner or person authorized to give consent.

FURTHERMORE, and the victim of the offense is an elderly person or disabled adult and the value of the property or services stolen is \$150,000 or more.

Forfeiture of Property - §2941.1417(A)

The Grand Jurors further find and specify that

the defendant(s) is/are the owner(s) and/or possessor(s) of Charles Schwab brokerage account # 558622495580714 which is contraband and/or property derived from or through the commission or facilitation of an offense, and/or is an instrumentality the offender(s) used or intended to use in the commission or facilitation of a felony offense.

(beneficiary Robert Paul: 52 questionable items totaling \$281,612.00)

The offense is contrary to the form of the statute in such case made and provided, and against the peace and dignity of the State of Ohio.

Ann Rowland

Foreperson of the Grand Jury

Michael C. O'Malley

Prosecuting Attorney

Count Three **Theft - F1**
§2913.02(A)(2)

Defendants Dorothea Kingsbury

Date of Offense On or about December 1, 2012 to November 27, 2017

The grand jurors, on their oaths, further find that the Defendant(s) unlawfully

did with purpose to deprive the owner, Bruce Campbell and/or Carol Campese and/or Carl Dunzweilwer and/or John Ehrman and/or \$66,866; Rachel Froula and/or John Fuller and/or Gregory Brian Greer and/or Bruce Hoehnen and/or Alvin Horton and/or John Jacklitz and/or Mindy Kaplan and/or Jeffrey Wallace Kettlewell and/or Barbara Kraus and/or Amanda Kucharski and/or Darlene Nelson and/or Michael Purdy and/or Gary Saus and/or Peter Sloe and/or Lorraine Yaspan, of money or services, knowingly obtain or exert control over either the property or services beyond the scope of the express or implied consent of the owner or person authorized to give consent.

FURTHERMORE, and the victim of the offense is an elderly person or disabled adult and the value of the property or services stolen is \$150,000 or more.

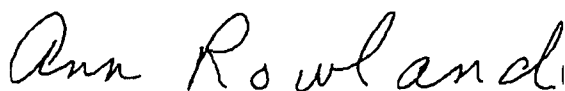
Forfeiture of Property - §2941.1417(A)

The Grand Jurors further find and specify that

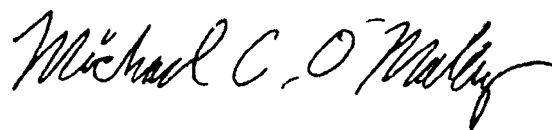
the defendant(s) is/are the owner(s) and/or possessor(s) of Charles Schwab brokerage account # 558622495580714 which is contraband and/or property derived from or through the commission or facilitation of an offense, and/or is an instrumentality the offender(s) used or intended to use in the commission or facilitation of a felony offense.

(Special Needs Trust Beneficiaries: Bruce Campbell, 13 questionable items totaling \$75,000; Carol Campese, 20 questionable items totaling \$23,900; Carl Dunzweilwer, 3 questionable items totaling \$3,400; John Ehrman, 20 questionable items totaling \$66,866; Rachel Froula, 11 items totaling \$10,400; John Fuller (passed away 1/16/16), 12 questionable items totaling \$16,600; Gregory Brian Greer, 7 questionable items totaling \$6,500; Bruce Hoehnen, 7 questionable items totaling \$11,000; Alvin Horton, 3 questionable items totaling \$3,500; John Jacklitz, 10 questionable items totaling \$17,700; Mindy Kaplan, 9 questionable items totaling \$5,394; Jeffrey Wallace Kettlewell, 7 questionable items totaling \$30,000; Barbara Kraus, 14 questionable items totaling \$43,800; Amanda Kucharski, 3 questionable items totaling \$1,850; Darlene Nelson, 15 questionable items totaling \$46,475; Michael Purdy, 9 questionable items totaling \$9,250; Gary Saus, 5 questionable items totaling \$6,600; Peter Sloe (passed away 7/2/14), 3 questionable items totaling \$2,500; Lorraine Yaspan, 13 questionable items totaling \$54,500)

The offense is contrary to the form of the statute in such case made and provided, and against the peace and dignity of the State of Ohio.



Foreperson of the Grand Jury



Prosecuting Attorney

Count Four **Theft - F2**
 §2913.02(A)(2)
Defendants Dorothea Kingsbury
Date of Offense On or about December 1, 2012 to April 9, 2018

The grand jurors, on their oaths, further find that the Defendant(s) unlawfully

did with purpose to deprive the owner, Elizabeth Limmex and/or Mary Jane Limmex Trust, of money or services, knowingly obtain or exert control over either the property or services beyond the scope of the express or implied consent of the owner or person authorized to give consent.

FURTHERMORE, and the victim of the offense is an elderly person or disabled adult and the value of the property or services stolen is \$37,500 or more and less than \$150,000.

Forfeiture of Property - §2941.1417(A)

The Grand Jurors further find and specify that

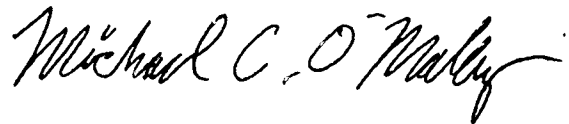
the defendant(s) is/are the owner(s) and/or possessor(s) of Charles Schwab brokerage account # 558622495580714 which is contraband and/or property derived from or through the commission or facilitation of an offense, and/or is an instrumentality the offender(s) used or intended to use in the commission or facilitation of a felony offense.

(Beneficiary Elizabeth Limmex: 51 questionable items totaling \$141,500.00)

The offense is contrary to the form of the statute in such case made and provided, and against the peace and dignity of the State of Ohio.



Foreperson of the Grand Jury



Prosecuting Attorney

Count Five **Telecommunications Fraud - F2**
 §2913.05(A)
Defendants Dorothea Kingsbury
Date of Offense On or about April 1, 2013 to September 30, 2017

The grand jurors, on their oaths, further find that the Defendant(s) unlawfully

having devised a scheme to defraud, did knowingly disseminate, transmit, or caused to disseminated or transmitted by means of wire, radio, satellite, telecommunication, telecommunications device, or telecommunication services any writing, data, sign, signal, picture, sound, image with purpose to execute or otherwise further the scheme to defraud.

FURTHERMORE, and the offender committed a violation of division (A) of Section 2913.05 of the Revised Code and the violation occurred as part of a course of conduct involving other violations of division (A) of Section 2913.05 of the Revised Code or violations of, attempts to violate, conspiracies to violate, or complicity in violations of section 2913.02, 2913.04, 2913.11, 2913.21, 2913.31, 2913.42, 2913.43, or 2921.13 of the Revised Code and the value of the benefit obtained by the offender or of the detriment to the victim of the fraud is one hundred fifty thousand dollars or more but less than one million dollars.

Forfeiture of Property - §2941.1417(A)

The Grand Jurors further find and specify that

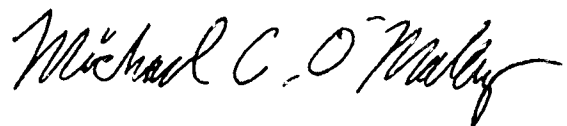
the defendant(s) is/are the owner(s) and/or possessor(s) of Charles Schwab brokerage account # 558622495580714 which is contraband and/or property derived from or through the commission or facilitation of an offense, and/or is an instrumentality the offender(s) used or intended to use in the commission or facilitation of a felony offense.

(In this time period online transfers from the individuals' trust accounts totaling over \$390,000.00 went into different Kingsbury accounts.)

The offense is contrary to the form of the statute in such case made and provided, and against the peace and dignity of the State of Ohio.



Foreperson of the Grand Jury



Prosecuting Attorney

Count Six **Money Laundering - F3**
 §1315.55(A)(1)
Defendants Dorothea Kingsbury
Date of Offense On or about May 1, 2014

The grand jurors, on their oaths, further find that the Defendant(s) unlawfully

did conduct or attempt to conduct a transaction knowing that the property involved in the transaction was the proceeds of some form of unlawful activity with the purpose of committing or furthering the commission of corrupt activity.

(Transactions: Kingsbury makes online transfers of \$1,000 from Bruce Campbell's and from John Ehrman's special needs trusts to account #4226164313, the Mary Jane Limmex Trust, the same day she withdraws \$5,000.00 cash from the Mary Jane Limmex Trust using check #666.)

The offense is contrary to the form of the statute in such case made and provided, and against the peace and dignity of the State of Ohio.

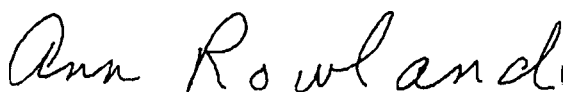
Count Seven **Money Laundering - F3**
 §1315.55(A)(1)
Defendants Dorothea Kingsbury
Date of Offense On or about December 14, 2014

The grand jurors, on their oaths, further find that the Defendant(s) unlawfully

did conduct or attempt to conduct a transaction knowing that the property involved in the transaction was the proceeds of some form of unlawful activity with the purpose of committing or furthering the commission of corrupt activity.

(Transactions: Kingsbury electronically transfers \$30,000.00 from Bruce Campbell's special needs trust to account #4267891731, Robert Paul's trust; that same day she electronically transfers \$52,136.12 from Robert Paul's trust to account #4267979316, Janis Paul's account, replenishing that account depleted from 7 questionable transactions totaling \$64,500 between 7/24/2012 and 6/27/2014, including 3 electronic transfers to account # 4226164313, the Mary Jane Limmex trust totaling \$8,000.00, and 4 cash withdrawals totaling \$56,500.00)

The offense is contrary to the form of the statute in such case made and provided, and against the peace and dignity of the State of Ohio.



Foreperson of the Grand Jury



Prosecuting Attorney

Count Eight **Money Laundering - F3**
 §1315.55(A)(1)
Defendants Dorothea Kingsbury
Date of Offense On or about December 22, 2014

The grand jurors, on their oaths, further find that the Defendant(s) unlawfully

did conduct or attempt to conduct a transaction knowing that the property involved in the transaction was the proceeds of some form of unlawful activity with the purpose of committing or furthering the commission of corrupt activity.

(Transactions: Kingsbury makes an online transfer of \$22,136.12 from John Erman's special needs trust to account #4267981731, Robert Paul's trust, four days after sending the \$52,136.12 from his trust to Janis Paul's account and also to replenish the \$11,700.00 that Kingsbury sent to herself online or withdrew through checks to herself between 12/30/2013 and 9/19/2014.)

The offense is contrary to the form of the statute in such case made and provided, and against the peace and dignity of the State of Ohio.

Count Nine **Money Laundering - F3**
 §1315.55(A)(1)
Defendants Dorothea Kingsbury
Date of Offense On or about August 12, 2015 to March 14, 2016

The grand jurors, on their oaths, further find that the Defendant(s) unlawfully

did conduct or attempt to conduct a transaction knowing that the property involved in the transaction was the proceeds of some form of unlawful activity with the purpose of committing or furthering the commission of corrupt activity.

Forfeiture of Property - §2941.1417(A)

The Grand Jurors further find and specify that

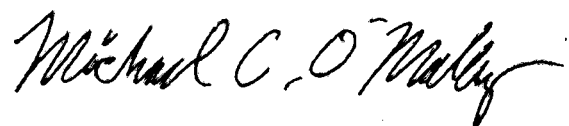
the defendant(s) is/are the owner(s) and/or possessor(s) of Charles Schwab brokerage account # 558622495580714 which is contraband and/or property derived from or through the commission or facilitation of an offense, and/or is an instrumentality the offender(s) used or intended to use in the commission or facilitation of a felony offense.

(Transaction: On 8/12/2015 Kingsbury makes an online transfer of \$1,000.00 from Carol Campese's special needs trust account and an online transfer of \$500.00 from Gregory Brian Greer's special needs trust account directly into Kingsbury's personal PNC checking account, #42-2369-1411. On 3/14/2016, \$350.00 transfers from Kingsbury's personal PNC checking account as a direct payment through Moneylink to a Charles Schwab brokerage account, #558622495580714).

The offense is contrary to the form of the statute in such case made and provided, and against the peace and dignity of the State of Ohio.



Foreperson of the Grand Jury



Prosecuting Attorney